

**REMARKS**

Claims 35-75 are pending in this application. By this Amendment, claims 47 and 69 are amended. No new matter is added by any of these amendments.

Applicant gratefully acknowledges that claims 35-46 and 49-58 are allowed, and that claims 62, 64 and 72-75 contain allowable subject matter. However, Applicant asserts that all of claims 35-75 are allowable for the reasons discussed below.

Reconsideration based on the following remarks is respectfully requested.

**I. Claims 47, 48, 59-61, 63 and 65-71 Define Patentable Subject Matter**

The Office Action rejects claims 69 and 70 under 35 U.S.C. §102(b) over U.S. Patent 5,714,968 to Ikeda. This rejection is respectfully traversed.

Ikeda does not teach or suggest a driving method to drive a driving circuit for a current driven element including, *inter alia*, a step for setting a first operating voltage of a first transistor and a second operating voltage of a second transistor by flowing a data current according to a data signal, as recited in claim 69.

Instead, Ikeda discloses a light emitting drive circuit. In particular, Ikeda teaches a current circuit 3 feeding a constant current of  $4 \cdot 10^{-3}$  mA (or 4  $\mu$ A) through transistors 16, 17 (col. 8, lines 45-49 and Fig. 9 of Ikeda). Furthermore, Ikeda provides a data signal as voltage via data lines 12, 13 (col. 8, lines 34-49 of Ikeda). By providing a constant current circuit 3, Ikeda does not supply a data current that depends on a data signal, and thus fails to anticipate Applicant's claimed features.

A claim must be literally disclosed for a proper rejection under §102. This requirement is satisfied "only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference" (MPEP §2131). Applicant asserts that the Office Action fails to satisfy this requirement with Ikeda.

The Office Action further rejects claims 59-61, 63, 65-68 and 71 under 35 U.S.C. §103(a) over Ikeda. This rejection is respectfully traversed.

A *prima facie* case of obviousness for a §103 rejection requires satisfaction of three basic criteria: there must be some suggestion or motivation either in the references or knowledge generally available to modify the references or combine reference teachings, a reasonable expectation of success, and the references must teach or suggest all the claim limitations (MPEP §706.02(j)). Applicant asserts that the Office Action fails to satisfy these requirements with Ikeda.

There is no motivation to modify features related to the fixed current through the transistors of Ikeda to provide that a data current, according to a data signal, determines first and second operating voltages of first and second transistors, respectively, as recited in Applicant's claims, nor has the Office Action established sufficient motivation for a *prima facie* case of obviousness. Even assuming that motivation to modify the applied reference is established, the modification fails to provide Applicant's claimed features.

The Office Action further rejects claims 47 and 48 under 35 U.S.C. §103(a) over International PCT Publication WO 99/65011 to Knapp *et al.* (hereinafter "Knapp") in view of U.S. Patent 3,443,151 to Myers *et al.* (hereinafter "Myers"). This rejection is respectfully traversed.

Knapp and Myers, alone or in combination, do not teach or suggest a driver circuit including a storage capacitor, a current driven element, a driving transistor of which a gate is connected to the storage capacitor, the driving transistor disposed between the current driven element and a voltage source, an n-channel transistor, and a p-channel transistor, operating voltage of the driving transistor being set by the storage capacitor by flowing a data current according to a data signal, a driving current that flows through the current driven element flowing through the n-channel transistor, the p-channel transistor and the driving transistor, the driving current flowing from the voltage source to the voltage driven element, and the current driven element being disposed between the n-channel transistor and the p-channel transistor, as recited in claim 47.

Applicant asserts that the Office Action fails to satisfy the requirements for a proper rejection under §103 with Knapp and Myers. Specifically, neither Knapp nor Myers provides a driving transistor flowing current to a current driven element. Nor do these references dispose the current driven element between a voltage source and a driving transistor.

Instead, Knapp discloses an electroluminescent display device with current-driven elements controlled by pixel circuits 10. In particular, Knapp teaches the pixel circuits 10 having a transistor 30, a switch 32 and a storage capacitor 38 (page 10, lines 3-15 and Fig. 2 of Knapp). By teaching that driving current flows from a supply line 34 to the driving transistor 30, Knapp teaches away from Applicant's claimed features.

Also, Myers discloses a control circuit 10. In particular, Myers teaches field effect transistors 20, 26 in series, and an electroluminescent cell 16 (col. 2, lines 63-71 and Fig. 1 of Myers).

Further, there is no motivation to combine features related to the pixel circuits of Knapp with the control circuit of Myers, nor has the Office Action established sufficient motivation for a *prima facie* case of obviousness. Even assuming that motivation to combine the applied references is established, the combination fails to teach or suggest Applicant's claimed features.

A *prima facie* case of obviousness for a §103 rejection requires satisfaction of three basic criteria: there must be some suggestion or motivation either in the references or knowledge generally available to modify the references or combine reference teachings, a reasonable expectation of success, and the references must teach or suggest all the claim limitations (MPEP §706.02(j)). Applicant asserts that the Office Action fails to satisfy these requirements with Knapp and Myers.

For at least these reasons, Applicant respectfully asserts that the rejected independent claims are now patentable over the applied references. The rejected dependent claims are likewise patentable over the applied references for at least the reasons discussed as well as for

the additional features they recite. Consequently, all the claims are in condition for allowance. Thus, Applicant respectfully requests that the rejections under 35 U.S.C. §§102 and 103 be withdrawn.

## II. Conclusion

In view of the foregoing amendments and remarks, Applicant respectfully submits that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further is desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,



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